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April 11, 2011

The Honorable Esther Salas, U.S.M.J.
U.S. District Court
M.L. King Jr. Federal Bldg. &
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Germe v. Township of Edison et al.
Docket No: 2:10cv-02528 (PGS/ES)
Claim No: U98975
DOL: May 20, 2008
Our File No: 87024

Dear Magistrate Judge Salas:


Our firm represents Police Officer Scot Sofield in connection with the above referenced matter, which is currently the subject of several defendants' motions for a stay of discovery, or in the alternative a protective order. Your Honor during our recent teleconference granted defendants the opportunity to supplement their submissions in support of that application given developments in regard to a Federal Grand Jury investigation occurring after the defense motions were fully briefed.

Ms. Dvorak on behalf of Police Officer Capriglione submitted a 3-page Supplemental Letter Memorandum with a copy of the Grand Jury Subpoena dated March 28, 2011 in further support of her client's application, and I respectfully request that on behalf of Officer Sofield I be permitted to rely on Ms. Dvorak's additional argument and analysis of the relevant factors enunciated by the Court in Walsh v. Securities, Inc. v. Cristo Property Management, Ltd., No. 7 F.Supp. 2d. 532, 526 (D.N.J. 1998).

Thank you.

Respectfully submitted,

WEINER LESNIAK LLP

By: 
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A Member of the Firm

AJB:tb

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